

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Luis Elfego RAMIREZ  
Ray Anthony ALMAROADCase No. **2:20-CR-2086**

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 28, 2020 in the county of Kenedy in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

Title 21, USC 841 (a)(1)

*Offense Description*

Knowingly, intentionally and unlawfully possess with the intent to distribute a controlled substance in Schedule II of the Controlled Substances Act of 1970, to wit: approximately 119.3 kilograms (AGW) of cocaine.

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.*Complainant's signature*

Robert E. LaRock, DEA Task Force Officer

*Printed name and title*Submitted by reliable electronic means, sworn to, signature attested telephonically per  
Fed.R.Crim.P. 4.1, and probable cause found:Date: **November 29, 2020***Judge's signature*City and state: **Corpus Christi, Texas**

Jason B. Libby, United States Magistrate Judge

*Printed name and title*

## **Attachment A**

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

### **FACTS/DETAILS:**

On November 27, 2020, Border Patrol Agent Modesto Morales-Trevino was assigned to primary inspection duties at the Javier Vega Jr. Border Patrol Checkpoint near Sarita, Texas. At approximately 11:40 p.m., a red in color Peterbilt tractor with a Texas license plate and a trailer with an Oklahoma plate approached the primary lane for an immigration inspection. The vehicle was driven by Luis Elfego Ramirez who stated that he was a United States Citizen and Co-Pilot Ray Anthony Almaroad who also stated he was a United States citizen. As BPA Morales-Trevino conducted his inspection, BPA Braulio Morales allowed his canine partner to perform a free air sniff of the vehicle's exterior. During the inspection, BPA B. Morales noticed one of the tractor tires was not inflated and notified the driver, RAMIREZ, that he had a flat tire.

At that time, BPA Morales-Trevino asked the driver Luis Elfego Ramirez, for consent to x-ray the vehicle he was driving to which he responded "Yes". RAMIREZ was then directed to the Backscatter secondary area and he drove the tractor trailer to that area for examination.

Once in the Backscatter secondary area, BPA C. Cox scanned the vehicle revealing anomalies in the passenger side gas tank. After observed the anomalies, he approached the driver's side door and asked the driver, RAMIREZ, if there had been any modifications or updates/upgrades to the vehicle. RAMIREZ then pointed to the passenger, ALMAROAD, who answered that parts of the dash board had been. A closer look into the diesel tank showed weld marks and what appeared to be a compartment within the tank. Agents were able to drill the aftermarket compartment and discovered bundles containing a white powdery substance that field tested positive for cocaine.

BP Agents located 110 bundles of cocaine, weighing a total of 119.3 kilograms. The bundles were wrapped differently, with 72 wrapped in silver colored wrapping, 34 in yellow and black wrapping, and 4 bundles in brown wrapping. RAMIREZ and ALMAROAD were both escorted into the BP checkpoint and held for DEA.

On November 28, 2020, Task Force Officer (TFO) Robert LaRock and TFO Allen Colston arrived at the checkpoint to take custody of the case and all case evidence.

The tractor that the cocaine was located in belongs to and is registered to Ray Anthony ALMAROAD, 14515 Briar Forest Dr. #1312, Houston, Texas.

RAMIREZ, in a recorded interview, was read his Miranda Warnings in English by TFO LaRock. RAMIREZ agreed to provide a statement at that time. During the interview, RAMIREZ denied knowledge of the cocaine in the gas tank. RAMIREZ only said that he was hired as a "Team" driver by ALMAROAD.

ALMAROAD, in a recorded interview, was read his Miranda Warnings in English by TFO LaRock. ALMAROAD agreed to provide a statement at that time. During the interview, ALMAROAD claimed that both he and his brother-in-law, (RAMIREZ) had knowledge they were transporting narcotics. ALMAROAD said that he was going to be paid \$3,600.00 for transporting the drugs and was unaware of the amount RAMIREZ was going to get paid for his participation. TFO LaRock believes that RAMIREZ and ALMAROAD both had knowledge they were transporting cocaine and the amount of cocaine infers the intent to distribute.

TFO LaRock spoke with AUSA Amanda Gould who accepted prosecution of RAMIREZ and ALMAROAD for Possession with Intent to Distribute 119.3 kilograms of cocaine.

Respectfully submitted,



Robert LaRock

Task Force Officer

Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P. 4.1., and probable cause found on:

Date: **November 29**, 2020

City and State: Corpus Christi, Texas

United States Magistrate Judge



Jason B. Libby